

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

JOANN ORTIZ,

Plaintiff,

v.

Case No. 1:16-cv-000739-WPL-KK

SAFECO INSURANCE COMPANY OF AMERICA,

Defendant.

**JOINT MOTION TO DISMISS DEFENDANT SAFECO INSURANCE
COMPANY OF AMERICA WITH PREJUDICE**

Plaintiff Joann Ortiz (“Plaintiff”), and Defendant, Safeco Insurance Company of America (“Safeco”), by and through their respective counsel, hereby respectfully request that the Court dismiss Plaintiff’s claims against Safeco with prejudice. As grounds for this Motion, the parties state that they have amicably resolved any and all issues between them, and no further controversies exist.

WHEREFORE, Plaintiff and Safeco respectfully request that the Court enter its Order dismissing Plaintiff’s claims against Safeco with prejudice, with each party to bear its, or her own costs.

Respectfully submitted,

RAY, MCCHRISTIAN & JEANS, P.C.

By: /s/ Shannon A. Parden

Shannon A. Parden

Shona L. Zimmerman

6000 Uptown Blvd. NE, Ste. 307

Albuquerque, NM 87110

Tel. (505)855-6000

Fax (505)212-0140

sparden@rmjfirm.com

szimmerman@rmjfirm.com

*Attorneys for Safeco Insurance Company of
America*

By: /s/ electronically approved 11/28/16

Brian G. Grayson
4700 Lincoln Rd. Suite 107
Albuquerque, NM 87109
(505) 273-8570
(505) 214-5007 (fax)
Attorney for Plaintiff

and

Mary Anne D'Arcangelis
620 Roma Ave. NW
Albuquerque, NM 87102
(505) 243-1223
Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served by email and through the Court's CM/ECF system this 28th day of November, 2016 to all counsel of record as follows:

Brian G. Grayson
Grayson Law Office, LLC
4700 Lincoln Rd. Suite 107
Albuquerque, NM 87109
(505) 273-8570
(505) 214-5007 (fax)
Attorney for Plaintiff

Mary Anne D'Arcangelis
620 Roma Ave NW
Albuquerque, NM 87102
(505) 243-1223
(505) 246-2668 (fax)
Attorney for Plaintiff